

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISHNU VARDHAN NALI,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 25-cv-03969
KRISTI NOEM, Secretary, Department of)	
Homeland Security; TODD LYONS, Acting)	
Director of the Immigration and Customs)	
Enforcement, each in their official capacity and)	
not individually; and UNITED STATES)	
DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff, Vishnu Vardhan Nali, through his counsel, moves for the entry of an order granting a preliminary injunction and temporary restraining order, restraining Defendants, Kristi Noem, Secretary, Department of Homeland Security, Todd Lyons, Acting Director of Immigration and Customs Enforcement (each in their official capacity) and United States Department of Homeland Security (i) from terminating Plaintiff’s F-1 student status under the SEVIS [Student and Exchange Visitor] system, and (ii) requiring Defendants to set aside their termination determination.

Plaintiff asks that the Court waive any requirement that Plaintiff give security pursuant to Fed. R. Civ. P. 65(c).

Plaintiff’s supporting Memorandum and supporting materials are submitted contemporaneously with this motion.

DATED: April 14, 2025

Respectfully submitted,

/s/ Jeffrey Grant Brown

Jeffrey Grant Brown

Attorney for Plaintiff

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